

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11340 DPW

STEPHEN KEEFE, *
Plaintiff *
 *
v. *
 *
LOCAL 805, INTERNATIONAL *
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, *
LOCAL 800, INTERNATIONAL *
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, *
and LOCAL 799, INTERNATIONAL *
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, *
Defendants *

VERDICT

1. In regard to the Plaintiff's claim of illegal retaliation, please answer the following question.
 - a. Has Keefe proven by a preponderance of the evidence that by suspending him and placing him back in Gang 12, the defendant Locals illegally retaliated against him?

Yes ___ No ___

If you have answered NO to Question 1, do not answer Question 2, but skip ahead to Question 3. If you have answered YES to Question 1, proceed to Question 2.

2. What amount of money, if paid now in cash, would fairly and reasonably compensate Keefe for the injuries or losses caused by the Defendants with regard to this claim? Answer in DOLLARS or NONE.
 - a. Injuries or losses _____
3. In regard to Keefe's claim that proper procedures were not followed by the defendants in disciplining Keefe, please answer the following question.
 - a. Has Keefe proven by a preponderance of the evidence that the defendant Locals did

not serve him with written specific charges, did not give him a reasonable time to prepare his defense, or did not afford him a full and fair hearing?

Yes ___ No ___

If you have answered NO to Question 3, do not go any further. If you have answered YES to Question 3, proceed to Question 4.

4. What amount of money, if paid now in cash, would fairly and reasonably compensate the Plaintiff for the following harms or losses caused by the Defendants with regard to this claim? Answer in DOLLARS or NONE in each blank.

a. Injuries or losses _____

Date

Foreperson